

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)
IMPLANT PRODUCTS LIABILITY) MDL NO. 2272
LITIGATION)
)
This Document Relates to All Cases) Master Docket Case No. 1:11-cv-05468
)
) Hon. Rebecca R. Pallmeyer

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Thursday, November 10, 2011, at 9:30 AM**, or as soon thereafter as we may be heard, counsel for all defendants shall appear before the Honorable Rebecca Pallmeyer in Courtroom 2119 of the U.S. District Court for the Northern District of Illinois, Dirksen Building, 219 South Dearborn, Chicago, Illinois, and then and there present the following motion: **Motion For Leave To File Written Position Statements In And For Presentation of Position Statements In Court.**

BAKER & DANIELS LLP

/s/ Joseph H. Yeager, Jr.

Joseph H. Yeager, Jr. (Ind. State Bar #2083-49)
Andrea Roberts Pierson (Ind. State Bar #18435-49)
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204
Telephone: (317) 237-0300
Fax: (317) 237-1000
Email: jay.yeager@bakerd.com
Email: andrea.pierson@bakerd.com

Attorneys for Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Orthopaedic Surgical Products, Inc., Wilson/ Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., Zimmer Surgical, Inc., and Zimmer US, Inc.

CERTIFICATE OF SERVICE

I certify that on November 2, 2011, a copy of the foregoing Notice Of Motion was filed electronically. Parties may access this filing through the Court's system. I further certify that on November 2, 2011, a copy of the foregoing Notice Of Motion was sent by first-class United States mail, postage prepaid, upon the following:

Alan Daniel Mathis
Johnston, Barton, Proctor & Rose LLP
563 Brookwood Village, Suite 901
Birmingham, AL 35209

Kim M. Schmid
Bowman & Brooke Law Firm
150 South Fifth Street, Suite 2600
Minneapolis, MN 55402

Bharati O. Sharma
Pogust Braslow & Millrood LLC
161 Washington Street, Suite 1520
Conshohocken, PA 19428

Mark E. Gebauer
Ecker Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

Don K. Ledgard
Capretz & Associates
5000 Birch Street, Suite 2500
Newport Beach, CA 92660

Matthew J Sill
Sill & Medley
14005 N. Eastern Avenue
Edmond, OK 73103

James T. Capretz
Capretz & Associates
5000 Birch Street, Suite 2500
Newport Beach, CA 92660

Richard J. Sapp
Nyemaster, Goode & McLaughlin
699 Walnut Street
1900 Hub Tower
Des Moines, IA 50309

Jennifer L. Crose
Becnel Law Firm, LLC
106 W. Seventh Street
P. O. Drawer H
Reserve, LA 70084

Roxanne Conlin
Conlin & Associates PC
319 7th Street, Suite 600
Des Moines, IA 50309

John P. Lavelle , Jr.
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921

Thomas R. Anapol
Anapol, Schwartz, Weiss & Schwartz
1900 Delancey Place
Philadelphia, PA 19103

Joseph N. Williams
Price Waicukauski & Riley, LLC
301 Massachusetts Avenue
Indianapolis, IN 46204

William L. Bross, IV
Heninger Garrison Davis, LLC
2224 1st Avenue North
Birmingham, AL 35203

Kevin R. Weiss
Laureate Group
1805 Kensington Drive
Waukesha, WI 53188

/s/ Joseph H. Yeager, Jr.